

1 James L. Poth (State Bar No. 185042)  
2 jlpoth@jonesday.com  
3 JONES DAY  
4 3161 Michelson Dr, #800  
5 Irvine, California 92612  
6 Telephone: (949) 851.3939  
7 Facsimile: (959) 553.2539

8 B. Kurt Copper (*pro hac vice*)  
9 bkopper@JonesDay.com  
10 JONES DAY  
11 2727 North Harwood Street, Suite 500  
12 Dallas, Texas 75201-1515  
13 Telephone: (214) 220.3939  
14 Facsimile: (214) 969.5100

15 Attorneys for Defendants  
16 MPOWERHEALTH PRACTICE  
17 MANAGEMENT, LLC; NORTH AMERICAN  
18 NEUROLOGICAL ASSOCIATES, PC; N  
19 EXPRESS PC; iNEUROLOGY, PC and BRUIN  
20 NEUROPHYSIOLOGY, PC

21 UNITED STATES DISTRICT COURT  
22  
23 CENTRAL DISTRICT OF CALIFORNIA  
24  
25 SOUTHERN DIVISION

26 ANTHEM BLUE CROSS LIFE AND  
27 HEALTH INSURANCE COMPANY, a  
28 California corporation, BLUE CROSS OF  
29 CALIFORNIA DBA ANTHEM BLUE  
30 CROSS, a California corporation,

31 Plaintiff,

32 v.

33 HALOMD, LLC; ALLA LAROQUE;  
34 SCOTT LAROQUE; MPOWERHEALTH  
35 PRACTICE MANAGEMENT, LLC;  
36 BRUIN NEUROPHYSIOLOGY, P.C.;  
37 iNEUROLOGY PC; N EXPRESS, PC;  
38 NORTH AMERICAN NEUROLOGICAL  
39 ASSOCIATES, PC; SOUND  
40 PHYSICIANS EMERGENCY  
41 MEDICINE OF SOUTHERN  
42 CALIFORNIA, P.C.; and SOUND  
43 PHYSICIANS ANESTHESIOLOGY OF  
44 CALIFORNIA, P.C.,

45 Defendants.

46 Case No. 8:25-cv-01467-KES

47 **DEFENDANTS**  
48 **MPOWERHEALTH PRACTICE**  
49 **MANAGEMENT, LLC; BRUIN**  
50 **NEUROPHYSIOLOGY, P.C.;**  
51 **iNEUROLOGY, PC; N EXPRESS,**  
52 **PC; AND NORTH AMERICAN**  
53 **NEUROLOGICAL ASSOCIATES,**  
54 **PC'S NOTICE OF MOTION TO**  
55 **JOIN IN THE SPECIAL**  
56 **MOTIONS TO STRIKE**  
57 **PURSUANT TO CAL. CODE CIV.**  
58 **PROC. § 425.16 FILED BY**  
59 **DEFENDANTS (A) HALOMD,**  
60 **LLC, ALLA LAROQUE, AND**  
61 **SCOTT LAROQUE; AND (B)**  
62 **SOUND PHYSICIANS.**

63 Hearing Date: March 10, 2026  
64 Hearing Time: 10:00 am  
65 Courtroom: 6D

66 Honorable Karen E. Scott  
67 Magistrate Judge

68 CASE NO. 8:25-cv-01467-KES

69  
70 NOTICE OF JOINDER AND JOINDER IN SPECIAL MOTIONS TO STRIKE

1                   TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2                   PLEASE TAKE NOTICE that Defendants MPOWERHealth Practice

3 Management , LLC; Bruin Neurophysiology, P.C.; N Express, PC; and North

4 American Neurological Associates, PC (collectively “Providers”)<sup>1</sup>, by and through

5 their undersigned counsel, hereby give notice that they move to join in the Special

6 Motions to Strike Pursuant to Calif. Code of Civil Proc. § 425.16 filed by: (1)

7 Defendants HaloMD, LLC, Alla LaRoque, and Scott LaRoque; and (2) Sound

8 Physicians. This joinder is based on the fact that the allegations of the First

9 Amended Complaint (FAC) against the Providers are so similar to those addressed

10 by the moving parties that a separate motion would be redundant and constitute an

11 unnecessary consumption of the Parties’ and Court’s time and resources.

12                   A request to join a separately filed motion should be granted when “either (1)

13 the parties are so similarly situated that filing an independent motion would be

14 redundant, or (2) the party seeking joinder specifically points out: which parts of

15 the motion apply to the joining party, the joining party’s basis for standing, and the

16 factual similarities between the joining party and moving party that give rise to a

17 similar claim or defense.” *Tatung Company, Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d

18 1138, 1151 (C.D. Cal. 2016) (*citing United States v. Longoria*, CR No. 89-225-FR,

19 1990 WL 11418, at \*4 (D. Or. Jan. 31, 1990); *United States v. Ledbetter*, No. 2:14-

20 CR-127, 2015 WL 5954587, at \*2 (S.D. Ohio Oct. 14, 2015); *United States v.*

21 *Cerna*, No. CR-08-0730 WHA, 2011 WL 500229, at \*12 (N.D. Cal. Feb. 9,

22 2011)); *United States v. Svihel*, No. 15-cr-190 (2)(4) (DSD/LIB), 2016 WL

23 1212364, at \*6 (D. Minn. Feb. 25, 2016). Both of those conditions are satisfied

24 here.

25

26

27                   <sup>1</sup> While MPOWERHealth Practice Management, LLC is not a medical provider like

28 the other defendants bringing this motion, this motion refers to these defendants as

“the Providers” for concision.

1           First, most of the substantive factual allegations of the FAC which are  
 2 subject to the pending motions are equally applicable to the Providers. Specifically,  
 3 the Independent Resolution (“IDR”) process the Providers are alleged to have  
 4 resorted to is the same “official proceeding authorized by law” which underlies the  
 5 pending motions. (FAC ¶ 67) The Providers engaged in the same open  
 6 negotiations (FAC ¶ 45), IDR submissions (FAC ¶ 54), eligibility submissions  
 7 (FAC ¶ 73) and allegedly “inflated” offers (FAC ¶ 119). Thus, Anthem seeks to  
 8 impose the same liability on the Providers for engaging in protected speech as it  
 9 does with the moving parties. Moreover, Anthem’s factual allegations against the  
 10 Providers implicate the Providers’ exercise of their first amendment rights in the  
 11 same way and for the same reasons articulated in the pending Special Motions to  
 12 Strike. Thus, the Providers have the same basis for standing as HaloMD, Alla  
 13 LaRoque, Scott LaRoque, and the Sound Physicians. As a result, a motion from the  
 14 Providers would be redundant.

15           What is more, both motions advance arguments that Anthem’s allegations  
 16 against them are predicated on protected activity and that Anthem cannot meet its  
 17 burden of establishing a likelihood of prevailing on its claims. Those aspects of the  
 18 pending motions are specifically applicable to the Providers. Anthem similarly  
 19 alleges that the Providers engaged in protected activity by pursuing their claims  
 20 against Anthem in Congressionally established IDR proceedings. (FAC ¶¶ 86-125).  
 21 Moreover, like the moving Defendants, the Providers have established that Anthem  
 22 cannot meet its burden under Cal. Code Civ. Proc. § 425.16 of establishing it can  
 23 prevail on its claims. The Providers detail their arguments on that point in their  
 24 separately filed motion to dismiss under Rule 12(b)(6).

25           ///

26           ///

27           ///

28           ///

1           Given these similarities and the fact that the legal assertions made in the  
2 pending motions are equally applicable to the Providers, the Providers respectfully  
3 request permission to join in those pending motions. Specifically, to the extent the  
4 Court grants those Special Motions to Strike with respect to the moving parties,  
5 they should be granted with respect to the Providers.

6

7           Dated: December 12, 2025

Respectfully submitted,

8

JONES DAY

9

By:



10

James L. Poth (State Bar No. 185042)

jlpoth@jonesday.com

JONES DAY

3161 Michelson Dr, #800

Irvine, California 92612

Telephone: (949) 851.3939

Facsimile: (959) 553.2539

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

B. Kurt Copper (*pro hac vice*)

bkcopper@jonesday.com

2727 North Harwood Street, Suite 500

Dallas, Texas 75201-1515

Telephone: (214) 220.3939

Facsimile: (214) 969.5100

Attorneys for Defendants

MPOWERHEALTH PRACTICE

MANAGEMENT, LLC; NORTH

AMERICAN NEUROLOGICAL

ASSOCIATES, PC; N EXPRESS PC;

iNEUROLOGY, PC and BRUIN

NEUROPHYSIOLOGY, PC